

Adam P. Slater
SLATER SLATER SCHULMAN LLP
445 Broad Hollow Road
Melville, New York 11747
Telephone: (631) 420-9300
Facsimile: (631) 465-7052
Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EMMANUEL AGROPONG, MARCOS BASABE,
ADRIAN BATANA, CARLOS LAGUNA, YOLANDA
NIEVE, CHRISTINE NUNEZ, ANDY OSEI, ABEL
PANTOJA, ELIETZER PIERRE-LOUIS, JOSUE
PIERRE- LOUIS, DAVID RICHARDSON, DANIEL
RODRIGUEZ, ROBERTO RODRIGUEZ, HECTOR
ROSADO, and SURITA SUEDASS, individually, and on
behalf of all others similarly situated,

Civil Action No. 14-cv-7990
(RWS)

AFFIDAVIT OF
ROBERTO RODRIGUEZ

Plaintiffs,

-against-

MICHAEL MEMON a/k/a IQBAL MEMON, GULAN
DORIA a/k/a JEFF DORIA, BERGEN DISCOUNT INC.,
BERGEN DISCOUNT PLUS, INC., 518 WILLIS
REALTY, INC., WILLIS DISCOUNT INC., ALI M.
ABADI d/b/a WILLIS DISCOUNT, ZIAD
NASSRADIN, ZNF 99 CENT DISCOUNT CORP.,
DOLLAR-RITE INC., TODO BARATO DISCOUNT
INC., COMMUNITY DOLLAR PLUS, INC., 167
TRADING DISCOUNT INC., 167 PRIMO TRADING
INC., B&S DISCOUNT INC., 99 CENT DISCOUNT &
PARTY STORE INC., 99 CENT DISCOUNT, INC.,
CLEAR CHOICE, INC., JOHN AND JANE DOES 1-50,
and JOHN DOE CORPORATIONS 1-20,

Defendants.

State of New York }
 } ss.:
County of New York }

ROBERTO RODRIGUEZ, being duly sworn, states as follows:

1. I am one of the Plaintiffs in this lawsuit against Bergen Discount and its managers for not paying minimum wage and overtime
2. I have personal knowledge of the facts asserted in this affidavit.
3. I worked for Defendants at several of the discount store worksites until I was terminated on or about August 22, 2014 when Defendants learned that I was preparing to be a plaintiff in this lawsuit.
4. The workers at the discount stores where I worked referred to Defendant Michael Memon a/k/a Iqbal Memon as "Mr. Mike" and Defendant Gulan Doria as "Mr. G."
5. Mr. G's brother Mohammed used to be in charge along with Mr. Mike and Mr. G until he died in August 2014. After Mr. G's brother died, Mr. Mike and Mr. G. were the main bosses at the discount stores where I worked.
6. In October 2014, I filed this lawsuit along with fourteen of my co-workers because Defendants failed to pay me minimum wage, overtime and other money owed for the many hours that I worked.
7. When people complained about being underpaid and not receiving overtime, they were punished for it, by management including Mr. G. and Mr. Mike.
8. I have personally witnessed Mr. Mike and Mr. G. tell other employees that they will have the employees deported if they cause them problems like contacting the Department of Labor or complaining about not being paid correctly.
9. The Department of Labor has investigated Bergen Discount for not paying workers properly. When investigators came to the store, Mr. Mike and Mr. G. told several workers to come later in the day, so they would not be seen by investigators.
10. I was sent to work on the second floor. Mr. Mike and Mr. G assumed that the

investigators would not look on the second floor. They were right.

11. I have personally witnessed Mr. Mike and Mr. G. tell other employees that he will have them deported if they cause problems which meant complaining about pay, or reporting them to the Department of Labor.
12. Before I was fired, me and several of my coworkers spoke to my lawyers about filing this lawsuit.
13. Abraham one of my coworkers who knew about this told Mr. Mike and Mr. G that we were planning to file this lawsuit.
14. On the day that I was fired, Mr. G. approached me and told me that Mr. Mike had a list of people that were planning to sue him and that I was on it.
15. Mr. G. told me that Mr. Mike said I had to go. And Mr. G. fired me right there.
16. On August 31, 2014, more than a week after I was fired, I was wrongly accused of stealing the company's money.
17. Mr. Mike and Mr. G. arranged for Samuel K. Quarshie, one of my co-workers, to complaint to police about me report claiming that I stole a bag of cash with \$9,000 of the company's money that Mr. Quashie was moving to another location. But it was not true.
18. Mr. Quarshie's claim was a lie and was made only to take revenge against me for being part of the lawsuit. I was nowhere near the any of the discount stores on that day.
19. The police questioned me about this, but I was never arrested and no charges were brought against me. I told them it was a set up.
20. I have continued to speak with many co- workers who are afraid to come forward and be part of the lawsuit.
21. They are afraid of losing their jobs, but they are most afraid of being deported or having

their families deported.

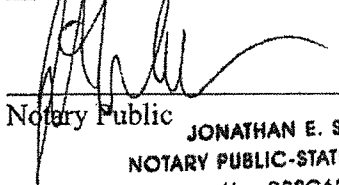
22. I learned from them that Mr. Mike recently started making workers sign blank documents about how much they are paid.

23. Mr. Mike told them that they would be fired and he would call immigration on them if they did not sign the papers. The same day, Mr. Mike also told them that he would fire or call immigration on anyone who signed up for the lawsuit.

24. Four workers have told me that they want to be part of the lawsuit and get paid the money they are owed, but they will not stand up because they are afraid of losing their job or being deported or having their families deported. I cannot tell you their names or they might have immigration trouble.


ROBERTO RODRIGUEZ

Sworn to before me this
8th day of May, 2015


Notary Public

JONATHAN E. SCHULMAN
NOTARY PUBLIC-STATE OF NEW YORK
No. 02SC6255197
Qualified in Suffolk County
My Commission Expires January 30, 2016

Adam P. Slater
SLATER SLATER SCHULMAN LLP
445 Broad Hollow Road
Melville, New York 11747
Telephone: (631) 420-9300
Facsimile: (631) 465-7052
Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EMMANUEL AGROPONG, MARCOS BASABE, ADRIAN
BATANA, CARLOS LAGUNA, YOLANDA NIEVE,
CHRISTINE NUNEZ, ANDY OSEL, ABEL PANTOJA,
ELIETZER PIERRE-LOUIS, JOSUE PIERRE-LOUIS,
DAVID RICHARDSON, DANIEL RODRIGUEZ, ROBERTO
RODRIGUEZ, HECTOR ROSADO, and SURITA SUEDESS,
individually, and on behalf of all others similarly situated,

Plaintiffs,

-against-

MICHAEL MEMON a/k/a IQBAL MEMON, GULAN DORIA
a/k/a JEFF DORIA, BERGEN DISCOUNT INC., BERGEN
DISCOUNT PLUS, INC., 518 WILLIS REALTY, INC.,
WILLIS DISCOUNT INC., ALI M. ABADI d/b/a WILLIS
DISCOUNT, ZIAD NASSRADIN, ZNF 99 CENT DISCOUNT
CORP., DOLLAR-RITE INC., TODO BARATO DISCOUNT
INC., COMMUNITY DOLLAR PLUS, INC., 167 TRADING
DISCOUNT INC., 167 PRIMO TRADING INC., B&S
DISCOUNT INC., 99 CENT DISCOUNT & PARTY STORE
INC., 99 CENT DISCOUNT, INC., CLEAR CHOICE, INC.,
JOHN AND JANE DOES 1-50, and JOHN DOE
CORPORATIONS 1-20,

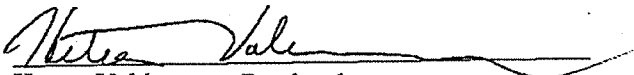
Defendants.

Civil Action No. 14-cv-7990 (RWS)

AFFIDAVIT OF DANIEL
RODRIGUEZ IN SUPPORT OF
PLAINTIFFS' REQUEST FOR AN
ORDER TO SHOW CAUSE AND
TEMPORARY RESTRAINING
ORDER

I, Hector Valderrama, am competent to translate from English to Spanish and certify that
Plaintiff Daniel Rodriguez's Affidavit is true and accurate to the best of my abilities.

Dated: May 6, 2015


Hector Valderrama, Paralegal
Slater Slater Schulman LLP
445 Broad Hollow Road
Melville, NY 11747

Adam P. Slater
SLATER SLATER SCHULMAN LLP
445 Broad Hollow Road
Melville, New York 11747
Telephone: (631) 420-9300
Facsimile: (631) 465-7052
Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EMMANUEL AGROPONG, MARCOS BASABE,
ADRIAN BATANA, CARLOS LAGUNA, YOLANDA
NIEVE, CHRISTINE NUNEZ, ANDY OSEI, ABEL
PANTOJA, ELIETZER PIERRE-LOUIS, JOSUE
PIERRE-LOUIS, DAVID RICHARDSON, DANIEL
RODRIGUEZ, ROBERTO RODRIGUEZ, HECTOR
ROSADO, and SURITA SUEDASS, individually, and on
behalf of all others similarly situated,

Civil Action No. 14-cv-7990
(RWS)

AFFIDAVIT OF DANIEL
RODRIGUEZ IN SUPPORT OF
PLAINTIFFS' REQUEST FOR
AN ORDER TO SHOW CAUSE
AND TEMPORARY
RESTRAINING ORDER

Plaintiffs,

-against-

MICHAEL MEMON a/k/a IQBAL MEMON, GULAN
DORIA a/k/a JEFF DORIA, BERGEN DISCOUNT INC.,
BERGEN DISCOUNT PLUS, INC., 518 WILLIS
REALTY, INC., WILLIS DISCOUNT INC., ALI M.
ABADI d/b/a WILLIS DISCOUNT, ZIAD
NASSRADIN, ZNF 99 CENT DISCOUNT CORP.,
DOLLAR-RITE INC., TODO BARATO DISCOUNT
INC., COMMUNITY DOLLAR PLUS, INC., 167
TRADING DISCOUNT INC., 167 PRIMO TRADING
INC., B&S DISCOUNT INC., 99 CENT DISCOUNT &
PARTY STORE INC., 99 CENT DISCOUNT, INC.,
CLEAR CHOICE, INC., JOHN AND JANE DOES 1-50,
and JOHN DOE CORPORATIONS 1-20,

Defendants.

State of New York }
 }ss.:
County of New York }

DANIEL RODRIGUEZ, being duly sworn, states as follows:

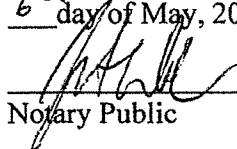
1. Soy Daniel Rodríguez, soy un demandante en la acción anterior con subtítulos.
2. Tengo conocimiento personal de los hechos, afirmó en esta declaración jurada.
3. Mi idioma materna es el español. No leyó o hablo Inglés.
4. He trabajado para los acusados en varias de las obras de la tienda de descuento desde noviembre de 2007.
5. Los trabajadores en las tiendas de descuento donde trabajaba se referían a Iqbal Memon acusado como "Mr. Mike" y acusado Gulan Doria como "g".
6. El Hermano del Sr. G. Mohammed solía estar al mando hasta que murió en agosto de 2014. Después de la muerte del hermano el Sr. G., Mr. Mike y Sr. G. fueron los principales jefes en las tiendas de descuento donde trabajaba.
7. Desde 2007 a principios de 2014, trabajé seis días once horas por semana para un total de sesenta y seis horas semanales. Para todos de 2014, trabajé cinco días de doce horas para un total de 60 horas semanales.
8. En octubre de 2014, presenté esta demanda junto con catorce de mis compañeros de trabajo porque los acusados no me pagaron el salario mínimo, horas extras y otro dinero adeudado a mí durante el curso de mi trabajo.
9. En enero de 2015, Mr. Mike redujo mis horas de trabajo de 60 a 30, diciendo que no tengo ningún trabajo para ti. Mis compañeros de trabajo que no participaron en la demanda no tenían sus horas de corte.
10. En abril de 2015, Mr. Mike pidió todos mis compañeros de trabajo a firmar lo que indica la cantidad de dinero que nos pagaron, pero todos los espacios eran en blanco
11. Las marcas fueron colocadas en el formulario en blanco que indica que los empleados deben rellenar el nombre y dirección del empleador e imprimir y firmar sus nombres.
12. Nos dijeron que no completa las otras secciones de la forma que tenía información sobre la cantidad de dinero que nos pagan.
13. En abril de 2015, pregunté a Mr. Mike por qué no aumentará mis horas mientras que todo el mundo está trabajando todo el día.
14. Un compañero de trabajo que habla inglés y español había traducido mi conversación con el Sr. Mike, quien habla a Inglés muy bien.
15. Sr. Mike dijo que aumentaría mis horas con dos condiciones.

16. En primer lugar, necesitaba que firmar el documento en blanco. Mr. Mike me dijo que todos los otros trabajadores habían firmado el documento.
17. En segundo lugar, él exigió que dejo de comunicarse con Carlos y demás. Mr. Mike entonces dijo que tenía que hablar con los abogados.
18. Entendí Mr. Mike estar refiriéndose a Carlos Laguna y otros demandantes en el juicio.
19. Carlos Laguna ya no trabajaba para los acusados. Él fue terminado en sobre agosto de 2014 cuando los acusados se enteró de que algunos de nosotros los trabajadores estaban planeando presentar la demanda.
20. En abril de 2015, mi abogado pidió que proporciono una copia de mi tarjeta de identificación personal para el caso. Envié la copia de mi tarjeta de identificación con mis abogados.
21. Yo no podía entender el documento porque no leo en Inglés.
22. Mr. Mike Sr. G. amenazó con despedirme si no firmé el documento.
23. Me negué a firmar el documento.
24. El Senor Mike y Senor G cortaron mis horas de 60 a 35 en represaria por negarme a firmar el documento.


DANIEL RODRIGUEZ

Sworn to before me this

6th day of May, 2015


Notary Public

JONATHAN E. SCHULMAN
NOTARY PUBLIC-STATE OF NEW YORK
No. 02SC6255197
Qualified in Suffolk County
My Commission Expires January 30, 2016

Adam P. Slater
SLATER SLATER SCHULMAN LLP
445 Broad Hollow Road
Melville, New York 11747
Telephone: (631) 420-9300
Facsimile: (631) 465-7052
Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EMMANUEL AGROPONG, MARCOS BASABE,
ADRIAN BATANA, CARLOS LAGUNA, YOLANDA
NIEVE, CHRISTINE NUNEZ, ANDY OSEI, ABEL
PANTOJA, ELIETZER PIERRE-LOUIS, JOSUE
PIERRE- LOUIS, DAVID RICHARDSON, DANIEL
RODRIGUEZ, ROBERTO RODRIGUEZ, HECTOR
ROSADO, and SURITA SUEDASS, individually, and on
behalf of all others similarly situated,

Civil Action No. 14-cv-7990
(RWS)

AFFIDAVIT OF
DANIEL RODRIGUEZ IN
SUPPORT OF PLAINTIFFS'
ORDER TO SHOW CAUSE

Plaintiffs,

-against-

MICHAEL MEMON a/k/a IQBAL MEMON, GULAN
DORIA a/k/a JEFF DORIA, BERGEN DISCOUNT INC.,
BERGEN DISCOUNT PLUS, INC., 518 WILLIS
REALTY, INC., WILLIS DISCOUNT INC., ALI M.
ABADI d/b/a WILLIS DISCOUNT, ZIAD
NASSRADIN, ZNF 99 CENT DISCOUNT CORP.,
DOLLAR-RITE INC., TODO BARATO DISCOUNT
INC., COMMUNITY DOLLAR PLUS, INC., 167
TRADING DISCOUNT INC., 167 PRIMO TRADING
INC., B&S DISCOUNT INC., 99 CENT DISCOUNT &
PARTY STORE INC., 99 CENT DISCOUNT, INC.,
CLEAR CHOICE, INC., JOHN AND JANE DOES 1-50,
and JOHN DOE CORPORATIONS 1-20,

Defendants.

State of New York }
 }ss.:
County of _____ }

DANIEL RODRIGUEZ, being duly sworn, states as follows:

1. I am Daniel Rodriguez, I am a Plaintiff in the above captioned action.
2. I have personal knowledge of the facts asserted in this affidavit.
3. My native language is Spanish. I do not read or speak English.
4. I have worked for Defendants at several of the discount store worksites since November 2007.
5. The workers at the discount stores where I worked referred to Defendant Iqbal Memon as "Mr. Mike" and Defendant Gulan Doria as "Mr. G."
6. Mr. G's brother Mohammed used to be in charge until he died in August 2014. After Mr. G's brother died, Mr. Mike and Mr. G. were the main bosses at the discount stores where I worked.
7. From 2007 to early 2014, I worked six eleven hour days per week for a total of sixty-six hours per week. For all of 2014, I worked five twelve hour days for a total of sixty hours per week.
8. In October 2014, I filed this lawsuit along with fourteen of my coworkers because Defendants failed to pay me minimum wage, overtime and other money owed to me throughout the course of my employment.
9. In January 2015, Mr. Mike reduced my work hours from sixty to thirty, saying I don't have any work for you. My coworkers who did not participate in the lawsuit did not have their hours cut.
10. In April 2015, Mr. Mike required all of my coworkers to sign forms indicating the amount of money we were paid, but all of the spaces were blank
11. Marks were placed on the blank form indicating that employees should fill in the employer's name and address and print and sign their names.

12. We were told not to complete the other sections of the form which had information about the amount of money that we are paid.
13. In April 2015, I asked Mr. Mike why he will not increase my hours while everyone else is working all day.
14. A co-worker who speaks both English and Spanish translated my conversation with Mr. Mike, who speaks English very well.
15. Mr. Mike said he would increase my hours on two conditions.
16. First, he required that I sign the blank document. Mr. Mike told me that all of the other workers had signed the document.
17. Second, he demanded that I stop communicating with Carlos and other guys. Mr. Mike then said he had to talk to lawyers about that.
18. I understood Mr. Mike to be referring to Carlos Laguna and other plaintiffs in the lawsuit.
19. Carlos Laguna no longer worked for Defendants. He was terminated in about August 2014 when Defendants found out that some of us workers were planning to file the lawsuit.
20. In April 2015, my attorney requested that I provide a copy of my personal identification card for the case. I sent the copy of my ID card to my lawyers.
21. On April 21, 2015, Mr. Mike and Mike G. required me to sign a document in English which they said was about the lawsuit.
22. I did not understand the document because I do not read English.
23. Mr. Mike and Mr. G. threatened to fire me if I did not sign the document.
24. I refused to sign the document.
25. Mr. Mike and Mr. G then suspended me for refusing to sign the document.

26. Mr. Mike and Mr. G then cut my hours from 60 to 35 in retaliation for refusing to sign the document.

DANIEL RODRIGUEZ

Sworn to before me this

___ day of May, 2015

Notary Public

Adam P. Slater
SLATER SLATER SCHULMAN LLP
445 Broad Hollow Road
Melville, New York 11747
Telephone: (631) 420-9300
Facsimile: (631) 465-7052
Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EMMANUEL AGROPONG, MARCOS BASABE, ADRIAN
BATANA, CARLOS LAGUNA, YOLANDA NIEVE,
CHRISTINE NUNEZ, ANDY OSEI, ABEL PANTOJA,
ELIETZER PIERRE-LOUIS, JOSUE PIERRE- LOUIS,
DAVID RICHARDSON, DANIEL RODRIGUEZ, ROBERTO
RODRIGUEZ, HECTOR ROSADO, and SURITA SUEDASS,
individually, and on behalf of all others similarly situated,

Civil Action No. 14-cv-7990 (RWS)

AFFIDAVIT OF DAVID
RICHARDSON IN SUPPORT OF
PLAINTIFFS' REQUEST FOR AN
ORDER TO SHOW CAUSE AND
TEMPORARY RESTRAINING
ORDER

Plaintiffs,

-against-

MICHAEL MEMON a/k/a IQBAL MEMON, GULAN
DORIA a/k/a JEFF DORIA, BERGEN DISCOUNT INC.,
BERGEN DISCOUNT PLUS, INC., 518 WILLIS REALTY,
INC., WILLIS DISCOUNT INC., ALI M. ABADI d/b/a
WILLIS DISCOUNT, ZIAD NASSRADIN, ZNF 99 CENT
DISCOUNT CORP., DOLLAR-RITE INC., TODO BARATO
DISCOUNT INC., COMMUNITY DOLLAR PLUS, INC., 167
TRADING DISCOUNT INC., 167 PRIMO TRADING INC.,
B&S DISCOUNT INC., 99 CENT DISCOUNT & PARTY
STORE INC., 99 CENT DISCOUNT, INC., CLEAR CHOICE,
INC., JOHN AND JANE DOES 1-50, and JOHN DOE
CORPORATIONS 1-20,

Defendants.

State of New York }
 } ss.:
County of New York }

DAVID RICHARDSON, being duly sworn, states as follows:

1. I am David Richardson, I am a Plaintiff in the above captioned action.
2. I have personal knowledge of the facts asserted in this affidavit.

3. I worked for Defendants at several of the discount store worksites since January 2008 until on or about April 20, 2015 as a stock worker.
4. The workers at the discount stores where I worked referred to Defendant Iqbal Memon as "Mr. Mike" and Defendant Gulan Doria as "Mr. G."
5. Mr. G's brother Mohammed used to be in charge along with Mr. Mike and Mr. G until he died in August 2014. After Mr. G's brother died, Mr. Mike and Mr. G. were the main bosses at the discount stores where I worked.
6. In October 2014, I filed this lawsuit along with fourteen of my co-workers because Defendants failed to pay me minimum wage, overtime and other money owed to me throughout the course of my employment.
7. On April 20, 2015, my lawyers asked me to give them a copy of my picture ID for the lawsuit.
8. The next day, upon arriving at work, I was presented with an affidavit which stated that I did not consent to being a part of the lawsuit against Bergen Discount and its affiliates.
9. I was told that if I did not sign the affidavit, I could not work in any of the stores.
10. Since I refused to sign the affidavit, I have not been allowed to return to work at any of the discount store worksites in retaliation for my refusal to sign the paper work.



DAVID RICHARDSON

Sworn to before me this

6th day of May, 2015



Notary Public

JONATHAN E. SCHULMAN
NOTARY PUBLIC-STATE OF NEW YORK
No. 025C6255197
Qualified in Suffolk County
My Commission Expires January 30, 2016

Adam P. Slater
SLATER SLATER SCHULMAN LLP
445 Broad Hollow Road
Melville, New York 11747
Telephone: (631) 420-9300
Facsimile: (631) 465-7052
Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EMMANUEL AGROPONG, MARCOS BASABE,
ADRIAN BATANA, CARLOS LAGUNA, YOLANDA
NIEVE, CHRISTINE NUNEZ, ANDY OSEL, ABEL
PANTOJA, ELIETZER PIERRE-LOUIS, JOSUE
PIERRE- LOUIS, DAVID RICHARDSON, DANIEL
RODRIGUEZ, ROBERTO RODRIGUEZ, HECTOR
ROSADO, and SURITA SUEDASS, individually, and on
behalf of all others similarly situated,

Civil Action No. 14-cv-7990
(RWS)

AFFIDAVIT OF
JOSUE PIERRE-LOUIS IN
SUPPORT OF PLAINTIFFS'
REQUEST FOR AN ORDER
TO SHOW CAUSE AND
TEMPORARY
RESTRAINING ORDER

Plaintiffs,

-against-

MICHAEL MEMON a/k/a IQBAL MEMON, GULAN
DORIA a/k/a JEFF DORIA, BERGEN DISCOUNT INC.,
BERGEN DISCOUNT PLUS, INC., 518 WILLIS
REALTY, INC., WILLIS DISCOUNT INC., ALI M.
ABADI d/b/a WILLIS DISCOUNT, ZIAD
NASSRADIN, ZNF 99 CENT DISCOUNT CORP.,
DOLLAR-RITE INC., TODO BARATO DISCOUNT
INC., COMMUNITY DOLLAR PLUS, INC., 167
TRADING DISCOUNT INC., 167 PRIMO TRADING
INC., B&S DISCOUNT INC., 99 CENT DISCOUNT &
PARTY STORE INC., 99 CENT DISCOUNT, INC.,
CLEAR CHOICE, INC., JOHN AND JANE DOES 1-50,
and JOHN DOE CORPORATIONS 1-20,

Defendants.

State of New York }
 }ss.:
County of New York }

JOSUE PIERRE-LOUIS, being duly sworn, states as follows:

1. I am Josue Pierre-Louis, I am a Plaintiff in the above captioned action.
2. I have personal knowledge of the facts asserted in this affidavit.
3. I was born in Haiti. I speak primarily French and some English.
4. I worked for Defendants at several of the discount store worksites since 2013 until I was terminated in December 2014 for my participation in this lawsuit.
5. The workers at the discount stores where I worked referred to Defendant Iqbal Memon as "Mr. Mike" and Defendant Gulan Doria as "Mr. G."
6. I was known in the workplace as Josh, and I do not believe that my employers knew that my actual name is Josue.
7. Mr. G's brother Mohammed used to be in charge along with Mr. Mike and Mr., G until he died in August 2014. After Mr. G's brother died, Mr. Mike and Mr. G. were the main bosses at the discount stores where I worked.
8. In October 2014, I filed this lawsuit along with fourteen of my co-workers because Defendants failed to pay me minimum wage, overtime and other money owed to me throughout the course of my employment.
9. In November 2014, my brother Elietzer Pierre-Louis was terminated for being involved in this lawsuit.
10. In December 2014, I was working a stock worker at one of the locations controlled by Defendants when I was approached by a manager. He informed me that Mr. G was very upset for being involved in the lawsuit. He said I was going to cause a lot of trouble for them.
11. The manager then handed me his phone and Mr. G. was on the line. Mr. G who terminated me over the phone.

12. I have not worked for Defendants since that time.

13. In April 2015, my lawyers asked me to give them a copy of my picture ID for the lawsuit.

14. A few days later I received a telephone call from Luckenson "Lucas" Camille.

Luckenson had helped me get the job working for defendants.

15. Luckenson told me the following: Mr. G. had sent him my identification cards; Mr. G. was very upset that I was involved in the lawsuit.

16. Luckenson tried to convince me to get out of the lawsuit or else Mr. G. was going to take my personal identification and give it to immigration authorities in order to have me deported.

17. Luckenson said that he would have to testify against me as a witness.

Josue Pierre L.
JOSUE PIERRE-LOUIS

Sworn to before me this
___ day of May, 2015

Notary Public
JONATHAN E. SCHULMAN
NOTARY PUBLIC-STATE OF NEW YORK
No. 025C6255197
Qualified in Suffolk County
My Commission Expires January 30, 2016